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9
10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 SHOSH YONAY and YUVAL
13 YONAY,

14 Plaintiffs,

15 v.

16 PARAMOUNT PICTURES
CORPORATION, a Delaware
17 corporation, and DOES 1-10,

18 Defendants.
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Case No. 2:22-CV-3846-PA-GJS

**JOINT STIPULATION RE:
DEFENDANTS' MOTION TO
COMPEL**

Case No. 2:22-CV-3846-PA-GJS

Tentative Hearing Date: Aug. 16, 2023
Hearing Time: 3:00p.m.
Place: Zoom
District Judge: Hon. Percy Anderson
Magistrate Judge: Hon. Gail J. Standish
Liability Disc. Cutoff: Oct. 6, 2023
Damages Disc. Cutoff: Feb. 23, 2024

JOINT STIPULATION

Plaintiffs Shosh Yonay and Yuval Yonay (“Plaintiffs”) and Defendant Paramount Pictures Corporation (“PPC” and, together with Plaintiffs, the “Parties”) stipulate as follows:

WHEREAS, on July 24, 2023, PPC filed a Motion to Compel (“Motion”) seeking an order requiring Plaintiffs to produce documents responsive to PPC’s First Set of Requests for Production (“RFPs”) and to serve amended responses to PPC’s First Set of Interrogatories (“ROGs”) and First Set of Requests for Admission (“RFAs”), ECF No. 40;

WHEREAS, on July 27, 2023, the Court entered a minute order directing Plaintiffs to file their opposition to PPC’s Motion on or before August 2, 2023, tentatively setting the Motion for hearing on August 16, 2023, ordering the Parties to meet and confer in-person by no later than August 9, 2023, and ordering the Parties to file a joint status report by no later than August 11, 2023 succinctly informing the Court of the matters that remain to be determined and those that have been disposed of by the parties, ECF No. 42;

WHEREAS, in an effort to resolve the Motion without the need for further Court intervention, as per the Court’s July 27 Order,¹ and so that Plaintiff’s counsel would not have to draft Plaintiffs’ opposition while on a family vacation overseas, the Parties met and conferred on August 1, 2023;

WHEREAS, as a result of this meet-and-confer, the Parties were able to reach a compromise agreement and agreed to jointly request that the concurrently-filed [Proposed] Order be so-ordered by the Court;

¹ Because Plaintiffs’ counsel has been out of the country on a family vacation since July 21 and is not scheduled to return until August 7 (which Defendant was unaware of prior to filing the Motion), the Parties met and conferred via Zoom (with video).

1 **WHEREAS**, the Parties agree that the [Proposed] Order is the result of
 2 compromise on behalf of both Parties, and shall not be viewed as an admission by
 3 either of the Parties as to any position in favor of or opposition to the Motion;

4 **WHEREAS**, the Parties agree that this Stipulation and [Proposed] Order
 5 obviates the need for Plaintiffs to file an opposition to PPC's Motion, as this
 6 Stipulation and [Proposed] Order resolves the issues raised in PPC's Motion, save
 7 as to three out of forty-nine request for production, which three are addressed in
 8 Paragraph 5 below.

9 Based on the foregoing, **IT IS HEREBY STIPULATED** by and between
 10 the Parties, through their respective counsel of record, subject to the Court's
 11 approval, that:

- 12 1. In response to PPC's Request for Production Nos. 1-35 and 43-49,
 13 Plaintiffs shall produce all non-privileged responsive documents
 14 identified through a reasonably diligent search.
- 15 2. In response to PPC's Request for Production Nos. 36 and 42, Plaintiffs
 16 shall produce any resumes, curriculum vitae, biographies, or other
 17 documents summarizing or characterizing Ehud Yonay's profession,
 18 work, or publications identified through a reasonably diligent search.
- 19 3. In response to PPC's Request for Production No. 37, Plaintiffs shall
 20 produce any published works authored by Ehud Yonay (except that
 21 Plaintiffs need not produce *Top Guns* and *No Margin for Error*, as
 22 PPC already has a copy of these two works authored by Ehud Yonay)
 23 identified through a reasonably diligent search.
- 24 4. In response to PPC's Request for Production No. 41, Plaintiffs shall
 25 produce documents constituting any speeches and lectures by,
 26 interviews of, or promotional materials about Ehud Yonay that relate
 27 to his work, professional life, or works that he authored, identified
 28 through a reasonably diligent search.

- 1 5. With regard to PPC's Request for Production Nos. 38-40, the Parties
2 shall continue to meet and confer. If the Parties are unable to reach
3 agreement, the Parties shall file a joint status report with the Court on
4 or before August 11, 2023 that summarizes the Parties' respective
5 positions in no more than one page per party. The Court shall rule on
6 these requests thereafter, unless the Court requests argument.
- 7 6. Plaintiffs shall complete their production, including service of any
8 privilege log, on or before August 21, 2023.
- 9 7. Plaintiffs shall amend their responses to PPC's Interrogatory Nos. 1-4
10 in compliance with Rule 33 to provide substantive answers based on
11 information known by them and/or their counsel, on or before August
12 21, 2023.
- 13 8. Plaintiffs shall amend their responses to PPC's Requests for
14 Admission to admit or deny each request in compliance with Rule 36
15 based on information known or readily obtainable by them and/or their
16 counsel on or before August 21, 2023.
- 17 9. PPC agrees that the above agreements once so-ordered by the Court
18 resolve PPC's Motion, except as to Requests Nos. 38-40 which are
19 discussed in Paragraph 5 above.
- 20 10. The Parties jointly request that the Court so-order the concurrently-
21 filed [Proposed Order].

1 Dated: August 2, 2023

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15 Dated: August 2, 2023

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1 Pursuant to Local Rule 5-4.3.4(a)(2)(i), the filer attests that all other
2 signatories listed, and on whose behalf the filing is submitted, concur in the filing's
3 content and have authorized the filing.
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6 Dated: August 2, 2023

O'MELVENY & MYERS LLP

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8 By: /s/ Molly M. Lens

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